

REMARKS

Claims 1-18 are all the claims pending in the application. The Examiner maintains his rejections of claims 1-18 under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. Claims 1-18 are also rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. Claims 1-4 and 10-13 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Sakakibara et al. (U.S. Patent No.: 5,617,575), hereinafter referred to as Sakakibara. Claims 5-9 and 14-18 contain allowable subject matter.

§ 112, second paragraph, Rejections - Claims 1-18

Claims 1-18 are rejected under 35 U.S.C. 112, second paragraph, for the same reasons set forth in the previous Office Action, and the Examiner adds new comments in the *Response to Arguments* section of the present Office Action. In the Office Action, the Examiner maintains that the essential structural cooperative relationships between elements cited in the claims have been omitted.

Applicant disagrees with the Examiner as Applicant believes that the essential structural cooperative relationships between elements cited in the claims are sufficiently recited such that 35 U.S.C. § 112, second paragraph, is satisfied. However, in an effort to advance prosecution, Applicant amends independent claims 1 and 10¹, as indicated herein. Applicant submits that these amendments incorporate the language proposed by the Examiner in the *Response to*

¹ Applicant submits that this amendment is being made for clarification purposes only and that this amendment does not necessitate further search and/or consideration.

Arguments section, and Applicant believes that these amendments obviate the Examiner's rejections of claims 1-18 under 35 U.S.C. § 112, second paragraph.

§ 112, first paragraph, Rejections - Claims 1-18

Claims 1-18 are rejected under 35 U.S.C. 112, first paragraph, for the reasons set forth on pages 2-3 of the Office Action. Specifically, the Examiner alleges, *inter alia*, "It is clear from the specification that the 'priority mapper' is NOT a combination of 'bus request receiver,' 'a priority level extractor,' 'a priority output unit,' and 'a master device identifier'." To support this allegation, the Examiner cites page 3, line 8 to page 4, line 2 of the present specification. In response, Applicant directs the Examiner's attention to page 8, lines 3-16 of the specification and Fig. 3 (detailed diagram of priority mapper), which specifically describe/illustrate the components that constitute the priority mapper, which include those set forth in the claims. Therefore, at least based on the above, Applicant submits that the rejections of claims 1-18 under 35 U.S.C. § 112, first paragraph, are obviated.

§ 102(b) Rejections (Sakakibara) - Claims 1-4 and 10-13

Claims 1-4 and 10-13 are rejected for the same reasons set forth in the previous Office Action, and the Examiner adds a few new arguments in the *Response to Arguments* section of the present Office Action.

First, Applicant maintains, as set forth in the previous amendment and as further argued below, that the Examiner does not address the specific limitations of each of the claims that are rejected as allegedly being anticipated.

In the Response to Arguments section of the present Office Action, the Examiner repeats many of the arguments set forth in the body of the Office Action. In response to the previously

submitted argument that Sakakibara does not disclose a priority mapper comprising a master device identifying unit, a bus request receiver, a priority level extractor, and a priority output unit, the Examiner alleges that the priority mapper, as claimed does not comprise a bus request receiver, a priority level extractor and a priority output unit. The Examiner alleges that the previously submitted argument is not even supported by the originally filed specification. In response, as set forth above with respect to the rejections under § 112, first paragraph, Applicant submits that this argument is, in fact, supported by the originally filed specification. Applicant directs the Examiner's attention to the portions of the specification cited above in the section discussing the section 112, first paragraph rejection.

Yet further, with respect to the rejection of claim 1, it was previously argued and Applicant maintains that Sakakibara does not disclose carrying a priority ID indicating a predetermined priority scheme. In the response to arguments section, the Examiner alleges that in any system involving arbitration, as well as Sakakibara, each master or requestor must carry a priority ID indicating a predetermined priority scheme along with other data. The Examiner directs Applicant's attention to "ID numbers" and the description thereof in Sakakibara. However, upon review of Sakakibara, it does not appear that ID numbers are mentioned with respect to indicating a predetermined priority scheme, contrary to the Examiner's argument.

Further, the Examiner believes, based on his assumption that each master or requestor must carry a priority ID indicating a predetermined priority scheme, that such priority indicator/scheme can only be represented by "priority level signals." Even if, *assuming arguendo*, Sakakibara teaches "priority level signals", Sakakibara does not specifically teach or suggest "a priority level extractor connected to said bus request receiver, for outputting priority level signals

indicating predesignated priority levels corresponding to the plurality of master devices, if the bus requests are input through the bus request receiver, and generating a priority level summation signal indicating all priority levels of the bus requests based on the output priority level signals.” The Examiner has not identified the alleged components of Sakakibara that allegedly correspond to the claim elements as set forth in the limitation above.

Yet even further, with respect to claim 1, in the previous Amendment it was argued that Sakakibara does not teach or suggest at least “a priority level extractor for...generating a priority level summation signal indicating all priority levels of the bus requests based on the output priority level signals,” as recited in claim 1. In response, the Examiner clarifies his previous argument and alleges that after the priority level signal of each master device is outputted, all priority levels corresponding to all master devices requesting access to the bus based on a particular arbitration scheme must be accounted for and represented by a signal input to the arbitration logic. In response, Applicant submits that the Examiner’s allegation is not taught or suggested in Sakakibara. Sakakibara does not teach or suggest that after a priority level signal of each master device is outputted, all priority levels corresponding to all master devices requesting access to a bus based on a particular arbitration scheme must be accounted for and represented by a signal input to the arbitration logic. The Examiner has apparently used impermissible hindsight reasoning developing this conclusion, in view of the present application. The Examiner has not even cited a portion of Sakakibara that allegedly supports this assertion; and, according to our understanding, Sakakibara does not teach or suggest the limitation quoted above in this paragraph. Therefore, Applicant maintains that Sakakibara does not teach or suggest at

least “a priority level extractor for...generating a priority level summation signal indicating all priority levels of the bus requests based on the output priority level signals.”

Applicant submits that independent claim 10 is patentable for reasons similar to those set forth above for claim 1, as claim 10 and claim 1 recite similar limitations. Applicant submits that dependent claims 2-4 and 11-13 are patentable at least by virtue of their respective dependencies from independent claims 1 and 10. Further, it was previously argued and Applicant maintains with respect to dependent claims 4 and 13, that Sakakibara does not teach or suggest the particular limitations of these claims. The Examiner did not address this argument in the present Office Action.

Therefore, at least based on the foregoing, Applicant submits that claims 1-4 and 10-13 are patentably distinguishable over Sakakibara.

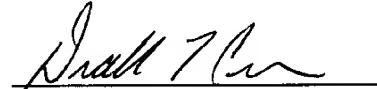
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.116
U.S. APPLN. NO.: 09/822,836

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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